

## **Sims, Mark**

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**From:** Jordan, Deborah  
**Sent:** Wednesday, July 17, 2013 3:23 PM  
**To:** Sims, Mark  
**Subject:** Automatic reply: 114 Letter to Blue Lake Power

I am traveling until Thursday. If you need immediate assistance, please contact Elizabeth Adams.

## **Sims, Mark**

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**From:** Sims, Mark  
**Sent:** Wednesday, July 17, 2013 11:10 AM  
**To:** Salazar, Matt  
**Subject:** Blue Lake Power 114 (For Weekly)

Matt,

Here's a quick blurb. Feel free to revise as you see fit.

On July 17, we issued a 114 letter to Blue Lake Power (in North Coast Unified AQMD) concerning the 2010 restart of the Facility (10 MW biomass-fired power plant) after a ten year shutdown. We will focus our enforcement investigation on whether this facility restart should have gone through PSD review, which it did not at the time of the restart.

## Sims, Mark

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**From:** Sims, Mark  
**Sent:** Tuesday, July 09, 2013 1:57 PM  
**To:** Chew, Andrew  
**Subject:** NCU Ultrapower permit in microfiche?

Thanks for looking

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**From:** Chew, Andrew  
**Sent:** Tuesday, July 09, 2013 1:39 PM  
**To:** Sims, Mark  
**Subject:** FW: binder of permit files in microfiche?

To close the loop on whether the Blue Lake/Ultrapower 3 PSD permit could possibly be in microfiche, I checked the stash and didn't find any permits for biomass plant in the NC (North Coast) files.

- Andrew

-----  
Andrew Chew, P.E.  
T: (415) 947-4197 | F: (415) 947-3579 | [chew.andrew@epa.gov](mailto:chew.andrew@epa.gov)  
U.S. EPA, Region 9, Air Permits Office (AIR-3) | 75 Hawthorne St., San Francisco, CA 94105

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**From:** Yannayon, Laura  
**Sent:** Tuesday, July 09, 2013 9:53 AM  
**To:** Chew, Andrew  
**Cc:** Wilder, Ceciley; Sims, Mark  
**Subject:** RE: binder of permit files in microfiche?

They should be on the shelf with all the PSD files, at the beginning, before AZ, in a expanded folder.

---

**From:** Chew, Andrew  
**Sent:** Wednesday, July 03, 2013 10:56 AM  
**To:** Yannayon, Laura  
**Cc:** Wilder, Ceciley; Sims, Mark  
**Subject:** binder of permit files in microfiche?

Hi Laura/Ceciley,

Can you let me know where I can find the binder of permit files in microfiche pls? Thanks!

- Andrew

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***EPA staff are scheduled to be out of the office on furlough on July 5th.***

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## Sims, Mark

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**From:** Sims, Mark  
**Sent:** Friday, June 21, 2013 8:08 AM  
**To:** Sui, Jennifer  
**Cc:** Baranco, Angela; Hanf, Lisa; Lieben, Ivan; Salazar, Matt  
**Subject:** Blue Lake Power -- Enforcement Investigation

Hi Jennifer,

Thanks for this information. This is not for a FOIA, this is for an air enforcement investigation. I'll make the necessary entries into AES in the next week or so.

Mark  
2-3965

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**From:** Sui, Jennifer  
**Sent:** Thursday, June 20, 2013 6:42 PM  
**To:** Sims, Mark  
**Cc:** Baranco, Angela; Hanf, Lisa  
**Subject:** FOIA?

**SUMMARY** - Compliance information for Blue Lake Power for the last 5 years:

1. NOVs = 3 NOVs
2. Dist Decreed = 2 DD's (see amounts below)
3. NTC's = Zero NTC's

Below is the AFS detailed compliance information for facility Blue Lake Power:

DATE : 06/20/13

AIRS FACILITY SUBSYSTEM - BRO

SCREEN: 507

PLANT ACTIONS

=====

00011 BLUE LAKE POWER

200 T

-----

ACTION: 00068

- DIST DAY 0

-----

KEY ACTION(S) : 00068

AIR PROGRAM CODE(S) .. : V

CREATIO

ACTION TYPE ..... : S9

ACTION TYPE CATE

DATE SCHEDULED (YYMMDD) : / /

DATE ACHIEVED (Y

RESULTS CODE ..... : 24

RESULTS DESCRIPT

PENALTY AMOUNT ..... :

RDE 8 .....

STAFF NAME ..... :

STAFF TITLE ..... :

POLLUTANT CODE ..... : PM10

CHEMICAL ABST

( PARTICULATE MATTER < 10 UM

CONTRACTOR ID ..... : -

RDE 16 ..... :

NATIONAL AIR INITIATIVES:

PF1=HELP

PF3=END

PF4=MAIN

PF5=TERM

PF12=UPDT

MA + a

DATE : 06/20/13 AIRS FACILITY SUBSYSTEM - BR  
SCREEN: 507 PLANT ACTIONS - VIOLATION

=====

06/023/00011 BLUE LAKE POWER 200

-----

AIR PROGRAM CODE(S) : V STATE REGISTRATI  
COMP STAT (EPA/ST) : / 5 CLASS: A STAFF:  
LEAD AGENCY: L VIOLATION IDENTIFIER: L VIOLATING PLLT  
VIOLATION TYPE CODE: M2B  
DAY 60: 100828 DAY 150: 101126 DAY 270: 110326 DAY 30  
DAYS USED TO ADDRESS: 325 UNADDRESSED DAYS: 0

ACTION NUM/IND/TYP	ACTION DESCRIPTION	DATE SCHED	DATE ACHVD	PENALTY AMOUNT	R
00068 S9	DIST DAY 0		100629		
00069 S8	DIST NOV		100513		
00076 A SK	DIST DECREE		110520	0460000	
00079 D RV	PART ONSITE LOC		100513		
00081 UX	RETURN TO COMPL		120315		

PF1=HELP PF3=END PF4=MAIN PF5=TERM

MA + a

DATE : 06/20/13 AIRS FACILITY SUBSYSTEM - BRO  
SCREEN: 508 PLANT LEVEL COMMENTS

=====

00011 BLUE LAKE POWER	200 T
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-----

ACTION: 00068

-----

COMMENT # 001 C : NOV#11117&11118,NUMEROUS OTHER NOV  
O NCU 097-12 CONDS A.III.A.2 & A.VI  
NOT OPERATE ESP, VEE VIOL'S, PNLT  
N COMPL-MONTHLY CEMS & COMS RPTS, S

ENFORC

PF1=HELP PF3=END PF4=MAIN PF5=TERM PF7=PREV PF8=NEXT

MA + a



DATE : 06/20/13

AIRS FACILITY SUBSYSTEM - BR

SCREEN: 507

PLANT ACTIONS

=====

00011 BLUE LAKE POWER

200

-----

ACTION: 00070

- DIST DAY 0

-----

KEY ACTION(S) : 00070

AIR PROGRAM CODE(S) .. : V

CREATI

ACTION TYPE ..... : S9

ACTION TYPE CAT

DATE SCHEDULED (YYMMDD) : / /

DATE ACHIEVED (

RESULTS CODE ..... : 24

RESULTS DESCRIP

PENALTY AMOUNT ..... :

RDE 8 .....

STAFF NAME ..... :

STAFF TITLE ..... :

POLLUTANT CODE ..... : PM10

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CONTRACTOR ID ..... : -

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NATIONAL AIR INITIATIVES:

PF1=HELP

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PF4=MAIN

PF5=TERM

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MA + a

DATE : 06/20/13 AIRS FACILITY SUBSYSTEM - BRO  
SCREEN: 507 PLANT ACTIONS - VIOLATION

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06/023/00011 BLUE LAKE POWER 200 T

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AIR PROGRAM CODE(S) : V STATE REGISTRATIO  
COMP STAT (EPA/ST) : / 5 CLASS: A STAFF:  
LEAD AGENCY: L VIOLATION IDENTIFIER: L VIOLATING PLLTS  
VIOLATION TYPE CODE: M2A  
DAY 60: 100828 DAY 150: 101126 DAY 270: 110326 DAY 300  
DAYS USED TO ADDRESS: 325 UNADDRESSED DAYS: 0

ACTION	ACTION	DATE	DATE	PENALTY	RE
NUM/IND/TYP	DESCRIPTION	SCHED	ACHVD	AMOUNT	C
00070 S9	DIST DAY 0		100629		
00071 S8	DIST NOV		100430		
00077 A SK	DIST DECREE		110520	0460000	
00080 D RV	PART ONSITE LOC		100430		
00082 UX	RETURN TO COMPL		120315		

PF1=HELP PF3=END PF4=MAIN PF5=TERM

MA + a

DATE : 06/20/13 AIRS FACILITY SUBSYSTEM - BRO  
SCREEN: 508 PLANT LEVEL COMMENTS

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00011 BLUE LAKE POWER	200
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ACTION: 00070

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COMMENT # 001 C : NOV#11684;REG 1, RULE 104.2.1,PTO  
;FAILURE TO CONTINUOUSLY OPERATE ES  
GREEMENT PNLTY \$1.38M SPLIT FOR 3  
ASED ON MONTHLY CEMS & COMS RPTS, \$

ENFOR

PF1=HELP PF3=END PF4=MAIN PF5=TERM PF7=PREV PF8=NEXT

MA + a

```

DATE   : 06/20/13           AIRS FACILITY SUBSYSTEM - BRO
SCREEN: 507                 PLANT ACTIONS
=====
00011 BLUE LAKE POWER                200 T
-----
ACTION: 00073          -   DT FRV DAY 0
-----

KEY ACTION(S) : 00073
AIR PROGRAM CODE(S) .. : V 0                CREATIO
ACTION TYPE ..... : SA                ACTION TYPE CATE
DATE SCHEDULED (YYMMDD) : / /                DATE ACHIEVED (Y
RESULTS CODE ..... : 24                RESULTS DESCRIPT
PENALTY AMOUNT ..... :                RDE 8 .....
STAFF NAME ..... :
STAFF TITLE ..... :
POLLUTANT CODE ..... : VE                CHEMICAL ABST
( VISIBLE EMISSIONS
CONTRACTOR ID ..... : -
RDE 16 ..... :
NATIONAL AIR INITIATIVES:

PF1=HELP PF3=END PF4=MAIN PF5=TERM PF7=PREV PF8=NEXT
Mâ + a

```

### Detailed Facility Information:

DATE : 06/20/13 AIRS FACILITY SUBSYSTEM - BRO  
SCREEN: 500 GENERAL PLANT INFORMATION

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CDS...	00011	NEDS.....	0097
EPA ID:	110013858398	DUN & BRADSTREET:	

-----

DATE PLANT INFORMATION LAST UPDATED (YYMMDD) : 12/07

PLANT NAME ... : BLUE LAKE POWER  
STREET ADDRESS : 200 TAYLOR WAY  
CITY ..... : - BLUE LAKE  
COUNTY ..... : 023 - HUMBOLDT  
NORTH AMERICAN INDUSTRY CLASS SYSTEM (NAICS): 221112  
STANDARD INDUSTRIAL CLASSIFICATION

PRIMARY : 4911 - ELECT  
SECONDARY: -  
TERTIARY : -

AIR TOXIC INITIATIVE ..... : -  
INSPECTOR ..... : -  
LOCAL CONTROL REGION ..... : 19 - NORTH COA  
REGIONAL PLANNING AGENCY ..... : SOURCE MONIT

PF1=HELP PF3=END PF4=MAIN PF5=TERM PF12=UPDT

MA + a

```
STATE COMPLIANCE STATUS : 5 - MEETING      EPA COMPLI
STATE CLASSIFICATION .. : A                EPA CLASSI
OPERATING STATUS ..... : 0 - OPERATIN
CONTINUOUS EMISSIONS .. :
PRIORITY CODE ..... : -
STATE REGISTRATION # .. :
GOVT. FACILITY CODE ... : 0 - PRIVATELY OWNED/OPERAT
FACILITY CAPACITY ..... : CAPACITY U

CONTACT PERSON ..... : (
PLANT DESCRIPTION ..... : ELECTRICAL SERVICES
```

```
PF1=HELP  PF3=END  PF4=MAIN  PF5=TERM  PF6=PGUP  PF1
```

```
MA + a
```

**From:** Sims, Mark  
**Sent:** Thursday, June 20, 2013 2:06 PM  
**To:** Sui, Jennifer  
**Subject:** Additional AFS/AIRS Request -- HPV

Hi Jennifer,

An additional request for HPV information – Blue Lake Power

This facility is near Eureka (North Coast Unified AQMD) at 200 Taylor Way, Blue Lake, CA (Humboldt County?). Looking for any NOV's, NTCs, enforcement settlement information. I think the facility was originally in the system as Ultrapower III, but Blue Lake Power purchased the facility sometime in 2009 or 2010.

I think North Coast had listed this facility as an HPV and took an enforcement action/settlement.

Thanks –

Mark  
2-3965

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KEY ACTION(S) : 00068
AIR PROGRAM CODE(S) .. : V                      CREATION
ACTION TYPE ..... : S9                        ACTION TYPE CATE
DATE SCHEDULED (YYMMDD) : / /                 DATE ACHIEVED (Y
RESULTS CODE ..... : 24                      RESULTS DESCRIPT
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RDE 16 ..... :
NATIONAL AIR INITIATIVES:

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SCREEN: 507 PLANT ACTIONS - VIOLATION

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06/023/00011 BLUE LAKE POWER 200

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COMP STAT (EPA/ST) : / 5 CLASS: A STAFF:  
LEAD AGENCY: L VIOLATION IDENTIFIER: L VIOLATING PLLT  
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INSPECTOR ..... : -  
LOCAL CONTROL REGION ..... : 19 - NORTH COA  
REGIONAL PLANNING AGENCY ..... : SOURCE MONIT

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CONTINUOUS EMISSIONS .. :
PRIORITY CODE ..... : -
STATE REGISTRATION # .. :
GOVT. FACILITY CODE ... : 0 - PRIVATELY OWNED/OPERAT
FACILITY CAPACITY ..... : CAPACITY U

CONTACT PERSON ..... : (
PLANT DESCRIPTION ..... : ELECTRICAL SERVICES
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## Sims, Mark

---

**From:** McDaniel, Doug  
**Sent:** Monday, June 17, 2013 3:32 PM  
**To:** Sims, Mark  
**Subject:** RE: Out Next Week (Blue Lake Power)

I reserved the Muir Room from 2 to 3:30. I will try to get a bunch done at once. Well, not at once, you know.

Douglas K. McDaniel  
Chief, Waste Section  
Enforcement Division, ENF-2-2  
U.S. EPA Region 9  
(415) 947-4106

---

**From:** Sims, Mark  
**Sent:** Monday, June 17, 2013 1:31 PM  
**To:** McDaniel, Doug  
**Subject:** Out Next Week (Blue Lake Power)

Hey Doug,

Except for Tuesday, I'm out next week.

Mark  
2-3965

P.S. Speaking of being out next week, I'm going up to Eureka to North Coast Unified AQMD to look at their files for a facility called Blue Lake Power. Do you know anything about these guys? According to AFS, these guys have been listed as an HPV with the District collecting \$1,000,000+ in a penalty settlement about 2 years ago.

Although we will be investigating different potential violations than what the District looked at, did the District ever talk to you about this facility? Let me know. Thanks –

Mark  
2-3965

---

**From:** McDaniel, Doug  
**Sent:** Monday, June 17, 2013 10:37 AM  
**To:** Adeduro, Kingsley; Steiner, Cynthia; Sims, Mark; Aldred, Charles; Ho, Yenhung; Lapka, Joseph  
**Cc:** Salazar, Matt; Jones, Joel E.  
**Subject:** and you thought...

...you were rid of me.

But no, it's not that easy. I have to do your midyear PARS per union agreement. Please send me an email with your availability for next Monday, Wednesday and Thursday, 6/24, 26 and 27. I'll come up when people are available and try to do them efficiently. If you are not in next week let me know ASAP. Thanks.

You can arrange to have Matt there if you want. I can't arrange it, per union agreement.

Doug

Douglas K. McDaniel  
Chief, Waste Section  
Enforcement Division, ENF-2-2  
U.S. EPA Region 9  
(415) 947-4106

## Sims, Mark

---

**From:** Sims, Mark  
**Sent:** Monday, June 17, 2013 3:26 PM  
**To:** McDaniel, Doug  
**Subject:** Tuesday June 25 at 2:00 (Lorax?)

Lorax is open, but system won't let me reserve the room. Can you reserve it?

---

**From:** McDaniel, Doug  
**Sent:** Monday, June 17, 2013 3:14 PM  
**To:** Sims, Mark  
**Subject:** RE: Tuesday June 25 at 2:00 is Good

Phil has 3 Masters wins, a British Open, and six 2nds in the US Open. Great by any measure. No sympathy here.

We'll find a room up there, can you check?

Douglas K. McDaniel  
Chief, Waste Section  
Enforcement Division, ENF-2-2  
U.S. EPA Region 9  
(415) 947-4106

---

**From:** Sims, Mark  
**Sent:** Monday, June 17, 2013 3:10 PM  
**To:** McDaniel, Doug  
**Subject:** Tuesday June 25 at 2:00 is Good

That day and time works. Got a room?

Folks are asking me up here today if I feel sorry for the Mick Man for finishing 2<sup>nd</sup> at the U.S. Open again. I see in today's Chron that Mick Man made \$696,000 for 2<sup>nd</sup> so my answer is "no." (Not that I felt sorry for him, anyway.)

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**From:** McDaniel, Doug  
**Sent:** Monday, June 17, 2013 2:41 PM  
**To:** Sims, Mark  
**Subject:** RE: Out Next Week (Blue Lake Power)

No, but you should ask Al Steer, and tell him I said hi. Better yet you should play golf and have a beer with him when you're up there.

PARS: How about Tuesday (the 25<sup>th</sup>) afternoon, 2pm?

Doug

Douglas K. McDaniel  
Chief, Waste Section  
Enforcement Division, ENF-2-2  
U.S. EPA Region 9  
(415) 947-4106

---

**From:** Sims, Mark  
**Sent:** Monday, June 17, 2013 1:31 PM  
**To:** McDaniel, Doug  
**Subject:** Out Next Week (Blue Lake Power)

Hey Doug,

Except for Tuesday, I'm out next week.

Mark  
2-3965

P.S. Speaking of being out next week, I'm going up to Eureka to North Coast Unified AQMD to look at their files for a facility called Blue Lake Power. Do you know anything about these guys? According to AFS, these guys have been listed as an HPV with the District collecting \$1,000,000+ in a penalty settlement about 2 years ago.

Although we will be investigating different potential violations than what the District looked at, did the District ever talk to you about this facility? Let me know. Thanks –

Mark  
2-3965

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**From:** McDaniel, Doug  
**Sent:** Monday, June 17, 2013 10:37 AM  
**To:** Adeduro, Kingsley; Steiner, Cynthia; Sims, Mark; Aldred, Charles; Ho, Yenhung; Lapka, Joseph  
**Cc:** Salazar, Matt; Jones, Joel E.  
**Subject:** and you thought...

...you were rid of me.

But no, it's not that easy. I have to do your midyear PARS per union agreement. Please send me an email with your availability for next Monday, Wednesday and Thursday, 6/24, 26 and 27. I'll come up when people are available and try to do them efficiently. If you are not in next week let me know ASAP. Thanks.

You can arrange to have Matt there if you want. I can't arrange it, per union agreement.

Doug

Douglas K. McDaniel  
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(415) 947-4106

## Sims, Mark

---

**From:** McDaniel, Doug  
**Sent:** Monday, June 17, 2013 3:14 PM  
**To:** Sims, Mark  
**Subject:** RE: Tuesday June 25 at 2:00 is Good

Phil has 3 Masters wins, a British Open, and six 2nds in the US Open. Great by any measure. No sympathy here.

We'll find a room up there, can you check?

Douglas K. McDaniel  
Chief, Waste Section  
Enforcement Division, ENF-2-2  
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**From:** Sims, Mark  
**Sent:** Monday, June 17, 2013 3:10 PM  
**To:** McDaniel, Doug  
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That day and time works. Got a room?

Folks are asking me up here today if I feel sorry for the Mick Man for finishing 2<sup>nd</sup> at the U.S. Open again. I see in today's Chron that Mick Man made \$696,000 for 2<sup>nd</sup> so my answer is "no." (Not that I felt sorry for him, anyway.)

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**From:** McDaniel, Doug  
**Sent:** Monday, June 17, 2013 2:41 PM  
**To:** Sims, Mark  
**Subject:** RE: Out Next Week (Blue Lake Power)

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(415) 947-4106

## Sims, Mark

---

**From:** Rios, Gerardo  
**Sent:** Tuesday, June 11, 2013 8:05 AM  
**To:** Sims, Mark  
**Cc:** Salazar, Matt; Lieben, Ivan; Chew, Andrew; GLASS, GEOFFREY  
**Subject:** RE: ENF-2-1 Request to AIR-3 for T5 Permit Renewal Review and Comment -- Blue Lake Power (NCUAQMD)

Hi Mark,

Geoffrey is looking into this renewal. Please coordinate with Geoffrey on specific things you think the permit should contain if you think there are potential issues. Typically we want to make sure that permits and enforcement issues are well coordinated. That being said, if there are issues that you think could be resolved through permitting, that would help us to understand so that we are working collaboratively. Similarly, if there are issues that you think should be resolved through enforcement, that would be good to understand as well so that we can decide how to move forward.

Thanks.

---

**From:** Sims, Mark  
**Sent:** Friday, June 07, 2013 8:08 AM  
**To:** Rios, Gerardo  
**Cc:** Salazar, Matt; Lieben, Ivan  
**Subject:** ENF-2-1 Request to AIR-3 for T5 Permit Renewal Review and Comment -- Blue Lake Power (NCUAQMD)

Hi Gerardo,

ENF-2-1 requests that you assign a member of your staff to review and comment on the (North Coast) Blue Lake Power Title V permit renewal. See e-mail below. Let us know. Thanks –

Mark  
2-3965

---

**From:** Sims, Mark  
**Sent:** Tuesday, June 04, 2013 1:15 PM  
**To:** Salazar, Matt  
**Cc:** Lieben, Ivan; Rios, Gerardo  
**Subject:** Request for T5 Permit Renewal Review and Comment -- Blue Lake Power (NCUAQMD)

Hi Matt,

I request that ENF-2-1 ask the Air Permits Office to review and comment on the proposed North Coast Unified AQMD Title V permit renewal for Blue Lake Power. Attached is the link to the proposed permit in Ivan's e-mail below. The proposed permit is now open for public comment, closing on July 3. We are currently conducting an enforcement investigation of this facility. The facility is a net 10.2 MW biomass-fired electric generating facility (boiler rated at 185 MMBTU/hr) which originally constructed and commenced operation in the mid-1980's. In 1999 the facility "temporarily" shut down, and did not restart until 2010.

We are currently investigating whether this facility should have gone through PSD review prior to its 2010 restart. Of particular interest to us is a statement on page 24 of the proposed permit engineering evaluation, which states, "The Facility was restarted in 2010 after the District determined that the proposed equipment modifications did not meet the

definition of “modification,” and therefore BLP did not obtain an Authority to Construct prior to making the following improvements:

1. Complete replacement of the super-heater tubes;
2. Replacement of three elements in the Economizer;
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4. Replacement of the I.D. fan rotor, cones, housing, and dampers”

+ other replacements. The facility also did not go through PSD review prior to the 2010 restart. We will review facility compliance with Title V, PSD, and NSPS (NSPS Subpart Db). However, we should request Air Permits Office to review and comment on the proposed Title V permit renewal , and opine on the adequacy (or lack thereof) of the PSD review for this facility restart. If the facility restart is subject to PSD, this facility will need BACT for NOx and likely better controls as BACT (baghouse instead of current ESP) for PM.

Let me know. Thanks –

Mark  
2-3965

---

**From:** Lieben, Ivan  
**Sent:** Friday, May 31, 2013 10:26 AM  
**To:** Sims, Mark  
**Subject:**

<http://ncuaqmd.org/index.php?page=major.source>

Ivan Lieben, Assistant Regional Counsel  
U.S. EPA Region 9, 75 Hawthorne Street  
San Francisco, CA 94105  
(415) 972-3914

This email, including attachments, may contain information that is confidential and/or protected by the attorney/client or other privileges.

## **Sims, Mark**

---

**From:** Lieben, Ivan  
**Sent:** Monday, June 10, 2013 4:49 PM  
**To:** Sims, Mark  
**Subject:** Check out what Mr. Martin from NCAQMD had to say about Blue Lake Power

BTW, they sell their power to San Diego to meet its RPS needs.

[http://www.times-standard.com/ci\\_10496359](http://www.times-standard.com/ci_10496359)

Ivan Lieben, Assistant Regional Counsel  
U.S. EPA Region 9, 75 Hawthorne Street  
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## Sims, Mark

---

**From:** Salazar, Matt  
**Sent:** Monday, June 10, 2013 12:06 PM  
**To:** Sims, Mark  
**Subject:** Thanks for sending this to Gerardo, I appreciate it (end of msg) RE: ENF-2-1 Request to AIR-3 for T5 Permit Renewal Review and Comment -- Blue Lake Power (NCUAQMD)

---

**From:** Sims, Mark  
**Sent:** Friday, June 07, 2013 8:08 AM  
**To:** Rios, Gerardo  
**Cc:** Salazar, Matt; Lieben, Ivan  
**Subject:** ENF-2-1 Request to AIR-3 for T5 Permit Renewal Review and Comment -- Blue Lake Power (NCUAQMD)

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2-3965

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**From:** Sims, Mark  
**Sent:** Tuesday, June 04, 2013 1:15 PM  
**To:** Salazar, Matt  
**Cc:** Lieben, Ivan; Rios, Gerardo  
**Subject:** Request for T5 Permit Renewal Review and Comment -- Blue Lake Power (NCUAQMD)

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Let me know. Thanks –

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**From:** Lieben, Ivan  
**Sent:** Friday, May 31, 2013 10:26 AM  
**To:** Sims, Mark  
**Subject:**

<http://ncuaqmd.org/index.php?page=major.source>

Ivan Lieben, Assistant Regional Counsel  
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## Sims, Mark

---

**From:** Sims, Mark  
**Sent:** Friday, June 07, 2013 9:32 AM  
**To:** Zabel, Allan  
**Subject:** FW: ENF-2-1 Request to AIR-3 for T5 Permit Renewal Review and Comment -- Blue Lake Power (NCUAQMD)

fyi

---

**From:** Sims, Mark  
**Sent:** Friday, June 07, 2013 8:08 AM  
**To:** Rios, Gerardo  
**Cc:** Salazar, Matt; Lieben, Ivan  
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**Sent:** Tuesday, June 04, 2013 1:15 PM  
**To:** Salazar, Matt  
**Cc:** Lieben, Ivan; Rios, Gerardo  
**Subject:** Request for T5 Permit Renewal Review and Comment -- Blue Lake Power (NCUAQMD)

Hi Matt,

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**Sent:** Friday, May 31, 2013 10:26 AM  
**To:** Sims, Mark  
**Subject:**

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## **Sims, Mark**

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**From:** Salazar, Matt  
**Sent:** Friday, June 07, 2013 8:08 AM  
**To:** Sims, Mark  
**Subject:** Automatic reply: ENF-2-1 Request to AIR-3 for T5 Permit Renewal Review and Comment  
-- Blue Lake Power (NCUAQMD)

Howdy,  
I will be out of the office on June 7th on furlough and return Monday June 10th.

Thank you,  
Matt

## Sims, Mark

---

**From:** Sims, Mark  
**Sent:** Friday, June 07, 2013 8:08 AM  
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**Sent:** Friday, May 31, 2013 10:26 AM  
**To:** Sims, Mark  
**Subject:**

<http://ncuaqmd.org/index.php?page=major.source>

Ivan Lieben, Assistant Regional Counsel  
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(415) 972-3914

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## Sims, Mark

---

**From:** Sims, Mark  
**Sent:** Thursday, June 06, 2013 11:59 AM  
**To:** Rivera, Shirley  
**Subject:** FW: Request for T5 Permit Renewal Review and Comment -- Blue Lake Power (NCUAQMD)

fyi

---

**From:** Sims, Mark  
**Sent:** Tuesday, June 04, 2013 1:15 PM  
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**Cc:** Lieben, Ivan; Rios, Gerardo  
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## Sims, Mark

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**From:** Sims, Mark  
**Sent:** Wednesday, June 05, 2013 7:40 AM  
**To:** Lieben, Ivan  
**Subject:** North Coast (Looks Like We're Good to Go)

Looks like we're good to go. I'll put the rental car on my TA.

---

**From:** Salazar, Matt  
**Sent:** Tuesday, June 04, 2013 4:31 PM  
**To:** Sims, Mark  
**Subject:** RE: Blue Lake Power (Travel/Inspection \$\$ Available?)

Hi Mark,  
Yes. Please do your TA for this.  
Thanks,  
Matt

---

**From:** Sims, Mark  
**Sent:** Tuesday, June 04, 2013 1:28 PM  
**To:** Salazar, Matt  
**Cc:** Lieben, Ivan  
**Subject:** Blue Lake Power (Travel/Inspection \$\$ Available?)

Hey Matt,

As part of our review of Blue Lake Power, Ivan and I would like to travel to Eureka to the North Coast Unified AQMD District office to review the District's permit, inspection, and enforcement files for BLP. We would likely travel to Eureka on Wednesday June 26 (I would rent a car, about a 5 hour trip), be at the District all day Thursday June 27 and maybe part of Friday. I would drive back to the Bay Area on Friday (or on Thursday if our review of District files gets completed early enough on Thursday).

Do we have travel money for a rental car + 2 days lodging and per diem at North Coast? Let me know. I don't see a need at this point to go to the facility. Review of the District files and a 114 letter(s) should be sufficient to gather the documentation necessary to establish whether we have a good enforcement case or not.

Let me know. Thanks –

Mark  
2-3965



## Sims, Mark

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**From:** Salazar, Matt  
**Sent:** Tuesday, June 04, 2013 4:34 PM  
**To:** Sims, Mark  
**Subject:** RE: Request for T5 Permit Renewal Review and Comment -- Blue Lake Power (NCUAQMD)

Lets add this to the one on one agenda, unless it's time sensitive...

---

**From:** Sims, Mark  
**Sent:** Tuesday, June 04, 2013 1:15 PM  
**To:** Salazar, Matt  
**Cc:** Lieben, Ivan; Rios, Gerardo  
**Subject:** Request for T5 Permit Renewal Review and Comment -- Blue Lake Power (NCUAQMD)

Hi Matt,

I request that ENF-2-1 ask the Air Permits Office to review and comment on the proposed North Coast Unified AQMD Title V permit renewal for Blue Lake Power. Attached is the link to the proposed permit in Ivan's e-mail below. The proposed permit is now open for public comment, closing on July 3. We are currently conducting an enforcement investigation of this facility. The facility is a net 10.2 MW biomass-fired electric generating facility (boiler rated at 185 MMBTU/hr) which originally constructed and commenced operation in the mid-1980's. In 1999 the facility "temporarily" shut down, and did not restart until 2010.

We are currently investigating whether this facility should have gone through PSD review prior to its 2010 restart. Of particular interest to us is a statement on page 24 of the proposed permit engineering evaluation, which states, "The Facility was restarted in 2010 after the District determined that the proposed equipment modifications did not meet the definition of "modification," and therefore BLP did not obtain an Authority to Construct prior to making the following improvements:

1. Complete replacement of the super-heater tubes;
2. Replacement of three elements in the Economizer;
3. Replacement of 1300 Air Heater tubes;
4. Replacement of the I.D. fan rotor, cones, housing, and dampers"

+ other replacements. The facility also did not go through PSD review prior to the 2010 restart. We will review facility compliance with Title V, PSD, and NSPS (NSPS Subpart Db). However, we should request Air Permits Office to review and comment on the proposed Title V permit renewal, and opine on the adequacy (or lack thereof) of the PSD review for this facility restart. If the facility restart is subject to PSD, this facility will need BACT for NOx and likely better controls as BACT (baghouse instead of current ESP) for PM.

Let me know. Thanks –

Mark  
2-3965

---

**From:** Lieben, Ivan  
**Sent:** Friday, May 31, 2013 10:26 AM  
**To:** Sims, Mark  
**Subject:**

<http://ncuaqmd.org/index.php?page=major.source>

Ivan Lieben, Assistant Regional Counsel  
U.S. EPA Region 9, 75 Hawthorne Street  
San Francisco, CA 94105  
(415) 972-3914

This email, including attachments, may contain information that is confidential and/or protected by the attorney/client or other privileges.

## Sims, Mark

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2-3965

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2-3965

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**Sent:** Friday, May 31, 2013 10:26 AM  
**To:** Sims, Mark  
**Subject:**

<http://ncuaqmd.org/index.php?page=major.source>

Ivan Lieben, Assistant Regional Counsel  
U.S. EPA Region 9, 75 Hawthorne Street  
San Francisco, CA 94105  
(415) 972-3914

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## Sims, Mark

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**From:** Chew, Andrew  
**Sent:** Thursday, May 09, 2013 4:13 PM  
**To:** Sims, Mark  
**Subject:** Didn't see Blue Lake or Ultrapower 3 PSD files in the spacesaver (EOM)

- Andrew

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Andrew Chew, P.E.

T: (415) 947-4197 | F: (415) 947-3579 | [chew.andrew@epa.gov](mailto:chew.andrew@epa.gov)

U.S. EPA, Region 9, Air Permits Office (AIR-3) | 75 Hawthorne St., San Francisco, CA 94105

***I'm scheduled to be out of the office on furlough for four consecutive Fridays beginning May 24<sup>th</sup> (until June 14th).  
If you need something while I'm away, please contact Gerardo Rios at (415) 972-3974.***

## **Sims, Mark**

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**From:** Lapka, Joseph  
**Sent:** Thursday, May 09, 2013 7:54 AM  
**To:** Sims, Mark  
**Subject:** Automatic reply: Blue Lake Power LLC--Potential Investigation

I will be out of the office on May 8, 2013 and will return on May 9.